### MCNAIR LAW FIRM, P.A.

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TELEPHONE (803) 799-9800 FACSIMILE (803) 376-2219

April 26, 2005

Public Service Commission of South Carolina Attn: Docketing Department Post Office Box 11649 Columbia, South Carolina 29211

Re: Application of UCN, Inc. for Amendment of Its Existing Certificate of Public Convenience and Necessity to Transact the Business of a Reseller and Facilities Based Provider of Local Exchange Services, for Approval of Its Initial Tariff, and for Flexible Regulation First Granted in Docket No. 97-467-C (SCPSC Docket No. 2005-40-C)

Dear Sir or Madam:

Please find enclosed for filing on behalf of the South Carolina Telephone Coalition an original and ten (10) copies of a Petition to Intervene in the above-referenced docket. By copy of this letter and Certificate of Service appended to the Petition, I am serving all parties of record.

Please clock in a copy of the Petition and return it by our courier.

Should you have any questions with respect to this matter, please do not hesitate to contact me.

Very truly yours,
Mayauth Tax

RECEIVED

APR 27 2005

DOCKETING DEPT.

Margaret M. Fox

**Enclosures** 

cc: John J. Pringle, Jr., Esquire Florence P. Belser, Esquire

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### **BEFORE**

## THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

Docket No. 2005-40-C

)

Re: Application of UCN, Inc. for Amendment of Its Existing Certificate of Public Convenience and Necessity to Transact the Business of a Reseller and Facilities Based Provider of Local Exchange Services, for Approval of Its Initial Tariff, and for Flexible Regulation First Granted in Docket

No. 97-467-C

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OCKETING DEPTION TO
INTERVENE

In response to the Commission's Notice of the Filing of the Application of UCN, Inc. for a Certificate of Public Convenience and Necessity to provide local exchange telecommunications services in South Carolina, the South Carolina Telephone Coalition ("SCTC") submits the within Petition to Intervene in this proceeding. In support of its Petition, SCTC would respectfully show unto this honorable Commission that:

- 1. SCTC is a coalition of local exchange telephone companies organized and doing business under the laws of the State of South Carolina. SCTC's members are telephone companies or telephone cooperatives subject to the jurisdiction of this Commission.
- 2. SCTC seeks to intervene in this proceeding with full rights to participate as a party of record insofar as its interests might appear.
- 3. SCTC's individual member companies provide local exchange telephone service within their respective geographic service areas. SCTC's position in this docket is that statewide certification of new entrant public interest. The Application, as currently drafted, would

potentially impact each of the SCTC member companies and, therefore, the SCTC has an interest in this proceeding.

4. Correspondence and communications to SCTC with respect to this proceeding should be directed to the undersigned counsel.

WHEREFORE, the South Carolina Telephone Coalition respectfully requests that this honorable Commission permit its intervention in this proceeding as its interests might appear.

Respectfully submitted,

M. John Bowen, Jr.
Margaret M. Fox
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

By:

Attorneys for Intervenor South Carolina

**Telephone Coalition** 

April 26, 2005

Columbia, South Carolina

### **BEFORE**

# THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Re: Application of UCN, Inc. for Amendment of Its

Existing Certificate of Public Convenience and

Necessity to Transact the Business of a Reseller

and Facilities Based Provider of Local Exchange

Services, for Approval of Its Initial Tariff, and

for Flexible Regulation First Granted in Docket

No. 97-467-C

CERTIFICATE OF

SERVICE

I, ElizaBeth A. Blitch, do hereby certify that I have this date served one (1) copy of the foregoing Petition to Intervene upon the following party of record by causing said copy to be deposited with the United States Mail, first class postage prepaid to:

John J. Pringle, Jr., Esquire Ellis Lawhorne & Sims, P.A. Post Office Box 2285 Columbia, South Carolina 29202

Florence P. Belser, Esquire Office of Regulatory Staff Post Office Box 11263 Columbia, South Carolina 29211.

> Liza Beth A. Blitch, Paralegal McNAIR LAW FIRM, P.A.

Post Office Box 11390

Columbia, South Carolina 29211

(803) 799-9800

April 26, 2005 Columbia, South Carolina